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**Sent:** 11/30/2018 11:25:09 PM  
**To:** Wehrum, Bill [Wehrum.Bill@epa.gov]  
**CC:** Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]; Woods, Clint [woods.clint@epa.gov]; Dominguez, Alexander [dominguez.alexander@epa.gov]  
**Subject:** Quad Oa -- a point about the RLSO  
**Attachments:** dshRLSOQuadOa.docx; dshCleanCopyQuadOaNPRM.docx

Bill,

Something I'd meant to mention, but forgot to bring up when we were talking, is that there's a bit of quirk with the RLSO that you should be aware of when you read it over. I did note that, in order to reflect where I *moved* original text (that is, text that the staff had produced and which is in the latest draft I've been trying to revise) to some other place in the document, I tweaked my Microsoft Word "track changes" settings so that original text that was moved would be shown in **green**, so that, where I subsequently edited the moved text, my edits would appear in a distinguishable **red**.

The problem is, the Word "track changes" feature, like so many Microsoft offerings, is, at best, a buggy, half-baked feature that functions in fits and starts when a document is large and the revisions are extensive. As pertinent here, when one moves portions of text which contains footnotes, the moved text itself will appear in the color of the user's choice (in my case, here, that **green** I mentioned), but the footnotes themselves will continue to appear in the colors assigned to deleted text (in the place in the document where the text previously resided), and, then, as inserted text (in the place to where the text is moved). Very annoying, and there's no evident fix or workaround. So be forewarned. As you're reviewing the RLSO, you will come across portions where it would appear that I've deleted a footnote (*i.e.*, since it will appear in **blue**, my default color for deletions), when in fact the footnote has actually been *moved* to some place elsewhere in the document (along with the text to which it was originally appended). It's not that big a deal, but I didn't want you to be confused by it and think the protocol I'd described to you when we were talking was faulty, or that you were misremembering what I said.

Attached is a copy of the RLSO that I gave you in hard copy earlier this evening. I've also attached a "clean copy," as I remained concerned that the amount of reorganization and rewriting that's reflected in the RLSO may make it hard for you to get a good sense of what the draft, as revised, actually looks like. Also, having an "accept all changes" clean copy to review serves to underscore just how rough this remains, as we discussed (*e.g.*, poor – and even nonexistent, in some

places – transitions in some places, as a consequence of the quick-and-dirty reorganization reflected here).

I've cc'd Mandy and Clint by way of something of a status report on where the Quad Oa policy package "rework" work stands, since I know both are interested. In sending this along, I'm not suggesting that they'd find it worthwhile to review, at this time, what's attached here. As I noted, I'm afraid the RLSO is as much a "proof of concept" as it is a true revision. I found that repurposing the latest draft of the NPRM to reflect what I took to be your vision of the thing was a rather heavier, and more time consuming, lift that I'd been anticipating. It needed a lot of work, and still does, I'm afraid.

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